

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
PLAINTIFF)
v.) Case No. 08 CR 325
)
)
TERRANCE SEWELL,)
)
)
DEFENDANT)

**DEFENDANT SEWELL'S MOTION FOR AN EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

Now comes Defendant Terrance Sewell, by and through his attorney and moves this Court to extend the time to file pretrial motions from May 28, 2008 to June 17, 2008. In support of this motion, Defendant states the following.

1. This is a two count indictment alleging that Mr. Sewell possessed cocaine in violation of 21 U.S.C. 841 and that he possessed a firearm after a felony conviction in violation of 18 U.S.C. §922(g).
2. The Court had previously set a deadline for filing of motions until May 28, 2008.
3. Defendant's attorney has only recently completed an 11 week criminal trial in federal court in which he is appointed counsel. That trial involved a discovery data base of 1.2 million pages of documents, several hundred hours of video and audio tapes and a significant number of legal issues that

Defendant's attorney had to brief.

4. Due to his work on that trial and a motion for new trial in that case, Defendant's attorney has been unable to complete his review of discovery or prepare all pretrial motions. It is anticipated that he will file one additional pretrial motion, a motion to suppress evidence obtained in a search.

5. Defendant's attorney will be out of town at a conference from June 25-20, 2008.

6. Defendant requests that his attorney be given until July 8 to prepare such motions. His attorney has spoken to the one of the AUSA's involved in this case and she has no objection to this motion being granted.

WHEREFORE DEFENDANT Sewell prays that this Court grant his motion to extend the date for filing of all pretrial motions until July 8, 2008.

Respectfully submitted,

s/Steven Saltzman
Attorney for Defendant Sewell

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